

EXHIBIT 7

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

| | | |
|-------------------------------------|---|--------------------------|
| Santana Bryson and Joshua Bryson, |) | |
| as Administrators of the Estate of |) | |
| C.Z.B., and as surviving parents of |) | |
| C.Z.B., a deceased minor, |) | Case No. 2:22-CV-017-RWS |
| |) | |
| Plaintiffs, |) | JURY TRIAL DEMANDED |
| |) | |
| v. |) | |
| |) | |
| Rough Country, LLC, |) | |
| |) | |
| Defendant. |) | |

**DEFENDANT ROUGH COUNTRY, LLC’S RESPONSES AND
OBJECTIONS TO PLAINTIFFS’ SECOND INTERROGATORIES**

Rough Country, LLC (“Rough Country”), named as a Defendant herein,
responds to Plaintiffs’ Second Interrogatories as follows:

INTERROGATORIES

1.

How many 4.5” Ford F-250 lifts has Rough Country sold in Georgia from
2018-present, broken down by year?

RESPONSE: See Attachment A, which contains responsive
CONFIDENTIAL unit volume detail through September 15, 2022, and which

EXHIBIT

P12

is being provided herewith subject to the confidentiality provisions of the Stipulated Confidentiality Agreement and Protective Order.

2.

How many Ford F-250 lifts that raise the bumper by more than 2 inches has Rough Country sold in Georgia from 2018-present, broken down by year?

RESPONSE: See Attachment B, which contains responsive **CONFIDENTIAL** unit volume detail through September 15, 2022, and which is being provided herewith subject to the confidentiality provisions of the Stipulated Confidentiality Agreement and Protective Order.

3.

How much revenue and profit has Rough Country made from 2018-present, broken down by year, from Ford F-250 lifts that raise the bumper over 2 inches?

RESPONSE: During a discovery videoconference on February 15, 2023, counsel for the parties discussed Rough Country's objections to Plaintiffs' request for five years of revenue and profits. Rough Country provided caselaw citations supporting its position that only a defendant's "current financial information" may be relevant to a claim for punitive damages. Plaintiffs' counsel is currently reviewing the authority provided and will respond to Rough Country's request to properly limit the timeframe

of this Interrogatory to two years.

To the extent Plaintiffs do not agree to the two-year timeframe, and to preserve its objections, Rough Country objects to this Interrogatory on the grounds that it is overly broad, not properly limited in time or scope, and seeks irrelevant information and information not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks financial information beyond Rough Country's most current or most recent financial information.

Subject to these objections and without waiver of same, see Attachment C, which contains responsive CONFIDENTIAL sales and gross profit information for 2021 and 2022, and which is being provided herewith subject to the confidentiality provisions of the Stipulated Confidentiality Agreement and Protective Order. By virtue of this response, and subject to the objections herein, Rough Country is withholding irrelevant revenue and profit data for the years 2018-2020.

4.

How much revenue and profit has Rough Country made from 2018-present, broken down by year, from Ford F-250 lifts that raise the bumper 4.5 inches?

RESPONSE: During a discovery videoconference on February 15,

2023, counsel for the parties discussed Rough Country's objections to Plaintiffs' request for five years of revenue and profits. Rough Country provided caselaw citations supporting its position that only a defendant's "current financial information" may be relevant to a claim for punitive damages. Plaintiffs' counsel is currently reviewing the authority provided and will respond to Rough Country's request to properly limit the timeframe of this Interrogatory to two years.

To the extent Plaintiffs do not agree to the two-year timeframe, and to preserve its objections, Rough Country objects to this Interrogatory on the grounds that it is overly broad, not properly limited in time or scope, and seeks irrelevant information and information not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks financial information beyond Rough Country's most current or most recent financial information.

Subject to these objections and without waiver of same, see Attachment D, which contains responsive CONFIDENTIAL sales and gross profit information for 2021 and 2022, and which is being provided herewith subject to the confidentiality provisions of the Stipulated Confidentiality Agreement and Protective Order. By virtue of this response, and subject to the objections

herein, Rough Country is withholding irrelevant revenue and profit data for the years 2018-2020.

5.

How much revenue and profit has Rough Country made from 2018-present, broken down by year, from lifts that raise vehicles by 4.5 inches or greater.

RESPONSE: During a discovery videoconference on February 15, 2023, counsel for the parties discussed Rough Country's objections to Plaintiffs' request for five years of revenue and profits. Rough Country provided caselaw citations supporting its position that only a defendant's "current financial information" may be relevant to a claim for punitive damages. Plaintiffs' counsel is currently reviewing the authority provided and will respond to Rough Country's request to properly limit the timeframe of this Interrogatory to two years.

To the extent Plaintiffs do not agree to the two-year timeframe, and to preserve its objections, Rough Country objects to this Interrogatory on the grounds that it is overly broad, not properly limited in time or scope, and seeks irrelevant information and information not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks financial information beyond Rough Country's most current or most recent financial

information.

Subject to these objections and without waiver of same, see Attachment E, which contains responsive CONFIDENTIAL sales and gross profit information for 2021 and 2022, and which is being provided herewith subject to the confidentiality provisions of the Stipulated Confidentiality Agreement and Protective Order. By virtue of this response, and subject to the objections herein, Rough Country is withholding irrelevant revenue and profit data for the years 2018-2020.

6.

How much overall revenue and profit did Rough Country make from 2018-present, broken down by year.

During a discovery videoconference on February 15, 2023, counsel for the parties discussed Rough Country's objections to Plaintiffs' request for five years of revenue and profits. Rough Country provided caselaw citations supporting its position that only a defendant's "current financial information" may be relevant to a claim for punitive damages. Plaintiffs' counsel is currently reviewing the authority provided and will respond to Rough Country's request to properly limit the timeframe of this Interrogatory to two years.

To the extent Plaintiffs do not agree to the two-year timeframe, and to preserve its objections, Rough Country objects to this Interrogatory on the grounds that it is overly broad, not properly limited in time or scope, and seeks irrelevant information and information not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks financial information beyond Rough Country's most current or most recent financial information.

Subject to these objections and without waiver of same, in accordance with Fed.R.Civ.P. 33(d), Rough Country refers Plaintiffs to its CONFIDENTIAL profit and loss statement for the years 2021 and 2022 that were produced in response to Request for Production No. 6 subject to the confidentiality provisions of the Stipulated Confidentiality Agreement and Protective Order. By virtue of this response, and pursuant to the objections herein, Rough Country is withholding irrelevant revenue and profit data for the years 2018-2020.

This 21st day of February, 2023.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/Claire C. Murray

Richard H. Hill

Georgia Bar No. 354425

Lindsay G. Ferguson

Georgia Bar No. 140970

Claire C. Murray

Georgia Bar No. 225885

3344 Peachtree Road, N.E.
Suite 2400
Atlanta, Georgia 30326
404-876-2700
404-875-9433 (fax)

*Attorneys for Defendant Rough Country,
LLC*

ATTACHMENT A - CONFIDENTIAL

| Year | 2018 | 2019 | 2020 | 2021 | 2022 |
|--------------|-------------|-------------|-------------|-------------|-------------|
| Units | ■ | ■ | ■ | ■ | ■ |

ATTACHMENT B - CONFIDENTIAL

| Year | 2018 | 2019 | 2020 | 2021 | 2022 |
|--------------|-------------|-------------|-------------|-------------|-------------|
| Units | ████ | ████ | ████ | ████ | ████ |

ATTACHMENT C - CONFIDENTIAL

| | 2021 Sales | 2021 Gross Profit | 2022 Sales | 2022 Gross Profit |
|-----------|------------|-------------------|------------|-------------------|
| 2" + F250 | | | | |

ATTACHMENT D - CONFIDENTIAL

| | 2021 Sales | 2021 Gross Profit | 2022 Sales | 2022 Gross Profit |
|------------|------------|-------------------|------------|-------------------|
| 4.5"+ F250 | | | | |

ATTACHMENT E - CONFIDENTIAL

| | 2021 Sales | 2021 Gross Profit | 2022 Sales | 2022 Gross Profit |
|-----------------|------------|-------------------|------------|-------------------|
| 4.5"+All Trucks | | | | |

CERTIFICATE OF SERVICE

This is to certify that I have electronically served the foregoing
DEFENDANT ROUGH COUNTRY, LLC'S RESPONSES AND OBJECTIONS
TO PLAINTIFFS' SECOND INTERROGATORIES via email to the attorneys of
record:

TEDRA L. CANNELLA
tedra@cannellasnyder.com
ROBERT H. SNYDER, JR.
rob@cannellasnyder.com
RORY A. WEEKS
rory@cannellasnyder.com
DEVIN L. MASHMAN
devin@cannellasnyder.com
CANNELLA SNYDER LLC
315 W Ponce de Leon Ave
Suite 885
Decatur, GA 30030

ATTORNEYS FOR PLAINTIFFS

This 21st day of February, 2023

WEINBERG, WHEELER,
HUDGINS, GUNN & DIAL, LLC

/s/Claire C. Murray

Claire C. Murray
Georgia Bar No. 225885

*Attorneys for Defendant Rough Country,
LLC*